

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEX PALACIOS,

X

Plaintiff,

**DECLARATION OF
DAVID ZELMAN IN
SUPPORT OF
PLAINTIFF'S MOTION
FOR PARTIAL
SUMMARY JUDGMENT
AND IN OPPOSITION TO
DEFENDANTS' MOTION
FOR SUMMARY
JUDGMENT**

-against-

15-cv-386

THE CITY OF NEW YORK, et. al.

Defendants.

X

DAVID A. ZELMAN, Esq., an attorney duly licensed to practice law before the Southern District of New York, as and for the plaintiff's declaration in support of his motion for summary judgment, being duly sworn deposes and says, upon information and belief, as follows:

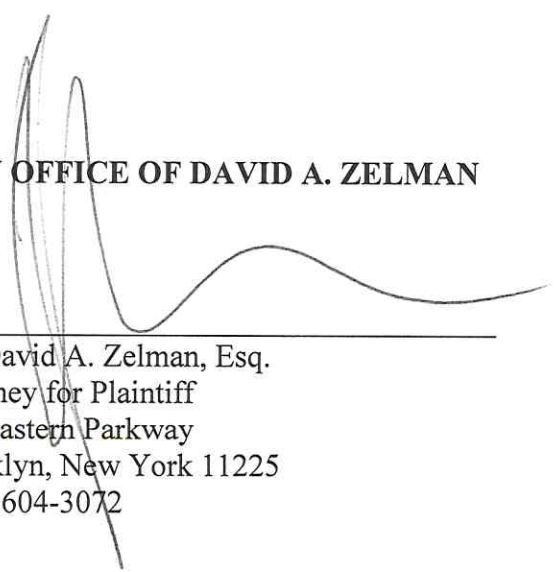
1. I submit this declaration to provide the court and counsel with a compendium of plaintiff's exhibits.
2. Plaintiff's Exhibit A is a joint statement of facts stipulated to by the parties.
3. Plaintiff's Exhibit B is a transcript of the deposition of Plaintiff Alex Palacios.
4. Plaintiff's Exhibit C is a transcript of the deposition of Defendant Michael Greaney.
5. Plaintiff's Exhibit D is a disclosure by Defendants, Bates stamped D1, D2, D3, D7, D10, D11, D42, D43, D46, D51, D57, D87.
6. Plaintiff's Exhibit E is a transcript of the deposition of the complaining witness in the criminal prosecution of plaintiff, M.P.

7. Plaintiff's Exhibit F is a transcript of the deposition of Defendant Chevere.
8. Plaintiff's Exhibit G is a transcript of the deposition of Defendant Monge.
9. Plaintiff's Exhibit H is the affidavit of Detective John Sabino and accompanying documentation.
10. Plaintiff's Exhibit I is a transcript of the deposition of witness Theresa Andrades-Harper.
11. Plaintiff's Exhibit J is transcript of the deposition of witness Letty Doiley.
12. Plaintiff's Exhibit K is a transcript of the deposition of witness John Sabino.
13. Plaintiff's Exhibit L is an Affidavit in Support of Declining Prosecution, bearing handwritten notes.
14. Plaintiff's Exhibit M is the report and transcript of an interview of the complaining witness M.P., conducted by Pentad Security.
15. Plaintiff's Exhibit N is a copy of the May 5, 2011 Summons.
16. Plaintiff's Exhibit O is a copy of the Certificate of Disposition, disposing of the May 5, 2011 Summons.
17. Plaintiff's Exhibit P is a transcript of a statement on the record dated September 13, 2016.

Dated: Brooklyn, New York

March 24, 2017

LAW OFFICE OF DAVID A. ZELMAN



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